

Message

From: Furey, Eileen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5AAA3A0EE58047D983897C53C1EB283E-EFUREY]
Sent: 7/26/2016 10:20:16 PM
To: Braverman, Carole [braverman.carole@epa.gov]
CC: Nam, Ed [nam.ed@epa.gov]
Subject: FW: follow up from our meeting this morning, with examples and additional documentation

Another one.

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From: Compher, Michael
Sent: Tuesday, July 26, 2016 10:39 AM
To: Furey, Eileen <furey.eileen@epa.gov>; Nam, Ed <nam.ed@epa.gov>
Subject: follow up from our meeting this morning, with examples and additional documentation

Here are a few examples of recent TSA findings. The one from MPCA's draft report directly relates to Jesse's issue. The two below from IDEM aren't for the biweekly QC checks, but overall communicate the direction we provide when the various checks of our data are appropriately and accurately reported. These are all categorized as minor findings, as they relate to conformance with EPA guidance. See also page 6 of EPA's monitoring program QA Newsletter (<https://www3.epa.gov/ttnamti1/files/ambient/qa/qanews13.pdf>), which speak directly to this issue. The big message we also convey from this article is "It is recommended that QAPPs include wording that addresses when to retain and when to exclude QA and QC data from AQS and when to conduct replacement QA/QC checks. However, it is impossible to foresee every circumstance that might lead to a poor QA/ QC result and, in some cases, it might not be obvious whether to report or exclude a result. In these cases decisions may fall to the responsible QA officers or managers. Discussions between the EPA Region and monitoring organizations might also need to occur to determine the best course of action."

Finding 14 and 17 of the IDEM TSA Final Report (Summer 2015)

14. IDEM should report all annual performance evaluations to AQS, even annual performance evaluations that fail audit criteria or that have been completed in addition to the minimum required audits. Unless it can be determined that the audit system was malfunctioning, these audits should be considered an accurate assessment of the instruments response and should be reported to AQS.

17. A thru-the-probe audit failed on 7/16/2015 at Brownstown 18-071-0001. The average percent difference was -23.4%. IDEM did not conduct any follow up corrective action to address the failure.

From MPCA's recent audit draft report (July 2016):

28. MPCA reported to AQS numerous one-point quality control checks that fail EPA acceptance criteria. MPCA should reevaluate their 2013, 2014, and 2015 quality assurance data in AQS to ensure it accurately reflects the precision and bias of their routine data. It is EPA policy that only one-point quality control checks that represent the precision and bias of valid data should be present in AQS. If data is invalidated, then the quality control checks associated with that data should not be reported to AQS per QA Eye Issue 13 page 6.

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